

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

J.K.J.,

Plaintiff,

Civil Action No. 15-cv-428-wmc

v.

POLK COUNTY AND
DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

M.J.J.,

Plaintiff,

Civil Action No. 15-cv-433-wmc

v.

POLK COUNTY AND
DARRYL L. CHRISTENSEN,

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE
CORPORATION,

Intervenor.

DECLARATION OF LIDA M. BANNINK

LIDA M. BANNINK declares, pursuant to 28 U.S.C. § 1746 and under the penalty of perjury,
that the following is true and correct:

1. I am attorney licensed in the State of Wisconsin and admitted to practice in the Western District of Wisconsin.
2. I am one of the attorneys representing Plaintiffs M.J.J. and J.K.J. in the above-captioned matter.
3. I make this Declaration in support of the Court's Order for submission of reasonable attorneys' fees and costs under 42 U.S.C. §1988(b).
4. Attached are true and correct copies of the following documents:
 - EXHIBIT A: Fee Agreement for Plaintiff M.J.J.
 - EXHIBIT B: Fee Agreement for Plaintiff J.K.J.
 - EXHIBIT C: Eckberg Lammers Time Records for files M.J.J. and J.K.J. with redactions for privileged and confidential information.
 - EXHIBIT D: Eckberg Lammers Summary of Costs for files M.J.J. and J.K.J.
 - EXHIBIT E: Eckberg Lammers Invoices/Expenses for files M.J.J. and J.K.J. with redactions for sensitive identifying and financial information (Exhibit E: 1-131).
 - EXHIBIT F: Support for hourly rates under Eckberg, Lammers, Briggs, and Wolff & Vierling with redactions for individuals not involved in these files.
 - EXHIBIT G: Support for hourly rates under Eckberg Lammers, P.C. with redactions for individuals not involved in these files.
5. On January 1, 2016, during the pendency of this action, Eckberg, Lammers, Briggs, Wolff & Vierling, PLLP became Eckberg Lammers, P.C.
6. The total attorney fees incurred as a result of the prosecution of these two civil rights actions requested for reimbursement are \$470,695.00, *see* Exhibit C.
7. The total costs incurred as a result of the prosecution of these two civil rights actions requested for reimbursement are \$69,127.62, *see* Exhibit D and E.
8. I have reviewed the time entries and costs in Exhibits C, D, and E and all of the services performed were reasonable and necessary in order to prosecute these two civil rights actions.
9. The fees and costs were not incurred for any improper purpose such as delay or harassment.
10. In Exhibit C, the Column titled "client" indicates which file the work entry was for. If work was done on both files, the denotation of "MJJ/JKJ" is used.
11. As is seen on Exhibits C, D, and E, matter number 26233 is Eckberg Lammers internal number for the file of M.J.J., 26532 is Eckberg Lammers internal number for the file of J.K.J. Given the large overlap of shared time and expenses between the two files, it was

our internal procedure that we would enter time and expenses incurred for both files under matter number 26233.

12. The redacted portions of Exhibit C include information pertaining to attorney-client communications and matters that are protected by privilege. Upon request, Plaintiffs are willing to submit the unredacted time entries to the Court for an *in camera* review.
13. The redacted portions of Exhibit E include sensitive identifying personal or financial information. Upon request, Plaintiffs are willing to submit the unredacted invoices/expenses to the Court for an *in camera* review.
14. The hourly rates indicated in Exhibits E and F were/are the customary hourly rates charged by Eckberg Lammers in all cases.
15. Other than Invoice # 85222 to McDowell Agency, Inc. in the amount of \$4,198.56, whose check is being cut on today's date, with respect to all invoices and expenses incurred in Exhibit E, Eckberg Lammers has paid each and every invoice/expense in full.
16. With relation to Exhibit C, Time records, the Timekeeper designations are as follows:
 - TJW: Thomas J. Weidner- attorney
 - LMB: Lida M. Bannink- attorney
 - JLKW: Jeffery L. Kemp- attorney
 - JFB: Jennifer F. Brodrick - paralegal
 - KCA: Karen C. Abraham - paralegal
 - LC: Law Clerk
17. Plaintiffs reserve the right to supplement this declaration to include any additional fees/expenses after the date this declaration is submitted.

ECKBERG LAMMERS, P.C.

Dated: 02/15/2017

By: /s Lida M. Bannink
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